

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: No. 22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

NOTICE OF MOTION TO COMPEL DISCLOSURES

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, Motion to Compel Disclosures, Declaration of Rena Andoh, together with all exhibits to those declarations and affidavits, and upon the Complaint and all proceedings had herein, Plaintiff Moog Inc. (“Moog”) by and through their undersigned counsel, Sheppard, Mullin, Richter & Hampton, LLP, and Hodgson Russ LLP, hereby move this Court for an order requiring defendant Skyryse, Inc. (“Skyryse”) to, on or before June 20, 2022:

1. Answer in full, via written filing and verified under oath by a Skyryse representative, all of Moog’s unanswered questions in its April 27, 2022 letter;
2. Complete its disclosure obligations, including identification and turnover of all data and devices that have been involved in the potential spoliation;
3. Produce to Moog or iDS (if the information necessarily contains Skyryse information) non-public Moog information in its possession, custody or control;

4. Send directly to Moog the 11,093 segregated files sent to iDS on April 1 and the 568 segregated files sent to iDS on April 29; and
5. Provide supplemental responses to Moog's Interrogatories Nos. 2-10 and RFAs Nos. 1-3 (and that Moog be provided until June 27, 2022 to move to compel on these supplemental responses, if needed); and
6. Provide a verification under oath by a Skyryse-representative that Skyryse has complied in full with the March 11 Order.

Moog respectfully requests that the hearing on Moog's Motion take place during the hearing already reserved for the Parties' monthly status conference with the Court on June 16, 2022 at 4:00 p.m. EST. Moog also respectfully requests that the Court require Skyryse to file its opposition brief on or before June 13, 2022, and Moog is prepared to waive a reply brief to accommodate the proposed on June 16, 2022.

Dated: New York, New York
June 8, 2022

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HAMPTON LLP**
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